

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

LEHMAN BROTHERS HOLDINGS INC., et al.,

Debtors.

$$\begin{array}{c} -\mathbf{X} \\ \vdots \\ \vdots \\ \vdots \\ \vdots \\ \vdots \\ \vdots \\ \vdots \\ -\mathbf{X} \end{array}$$

Chapter 11 Case No.

08-13555 (JMP)

(Jointly Administered)

DECLARATION OF JASON WHITE

Pursuant to 28 U.S.C. § 1746, Jason White declares as follows:

1. I am employed by Barclays Capital Inc. ("Barclays") as a Director and Associate General Counsel.

2. I make this Declaration in support of Barclays' Motion For Relief Concerning an American Express Contract Erroneously Posted With The Closing Date Contracts.

3. On or about October 1, 2008, I spoke with Lindsee Grandfield, outside counsel representing Barclays. After the conversation, I understood that an American Express Travel Related Services Company, Inc (“American Express”) contract (the “Contract”)¹ with Lehman Brothers Holding Inc. or one of its affiliates had been erroneously listed on a schedule of Non-IT Closing Date Contracts (the “Schedule”). I further understood that the Contract was being removed from the revised Schedule. To give American Express notice of the correction, I called Eugene Chikowski, counsel representing American Express.

¹ Since this time, I have come to understand that American Express had two contracts in place with LBHI and LBI—namely, a corporate card contract and a travel services contract—for which a combined cure amount had been listed in one entry on the list of Non-IT Closing Date Contracts.

4. I spoke with Eugene Chikowski and informed him of the error in the original Schedule and that the Contract would be removed from the revised Schedule. Mr. Chikowski sought to engage me in a substantive conversation regarding the contract and, in particular, working out a larger “business solution” to the situation. I told Mr. Chikowski that I did not have any background on this matter, and that my purpose in calling was simply to inform him of the correction to the Schedule.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 7th day of November, 2008.

/s/ Jason White
Jason White